

**BEIRNE, MAYNARD & PARSONS, L.L.P.**

601 POYDRAS STREET

SUITE 2200

NEW ORLEANS, LOUISIANA 70130-6097

L. EADES HOGUE, PARTNER

TELEPHONE: (504) 586-1241

FACSIMILE: (504) 584-9142

DIRECT DIAL 504-584-9431  
EMAIL: EHOGUE@BMPLLP.COM

July 30, 2014

The Honorable Nancy F. Atlas  
United States Courthouse  
515 Rusk Street, Room 9015  
Houston, TX 77002-2601

*Via E-file*

ATTN: Shelia Ashabranner, Case Manager

Re: Case No. 3:14-CV-532-NFA; *True the Vote, et al v. The Honorable Delbert Hosemann, et al*; In the United States District Court, Southern District of Mississippi, Jackson Division.

Dear Judge Atlas:

This letter addresses the Court's Order [Doc. 46], issued Friday July 25, 2014, that the parties indicate by July 30, 2014 whether they "desire to seek summary judgment at this stage" on the National Voter Registration Act ("NVRA") claims. Plaintiffs submit that they so desire.

The Court's Order [Doc. 46] further states that the parties must submit a joint briefing schedule such that briefing on the motions for summary judgment will be complete by Friday, August 22<sup>nd</sup>. Therefore, Plaintiffs submit the briefing schedule as follows:

**Wednesday, August 6, 2014:** motions for summary judgment,

**Friday, August 15, 2014:** responses to motions for summary judgment, and

**Friday, August 22, 2014:** replies in support of motions for summary judgment.

Plaintiffs' counsel discussed this briefing schedule with counsel for the Secretary of State, who indicated they were not opposed.<sup>1</sup> Please do not hesitate to contact us if you have any questions.

---

<sup>1</sup> As the appointed Chief Election Officer, the Circuits are bound by the direction of the Secretary of State. The motion for summary judgment Plaintiffs intend to file on the NVRA issues will therefore be directed to the Secretary of State as the Chief Election Officer. Therefore, Plaintiffs' counsel need only consult with counsel for the Secretary of State.

Very truly yours,



L. Eades Hogue

LEH/KWM

ccs:

**Mississippi Republican Party**

*Via E-file*

c/o Mr. Michael B. Wallace  
T. Russell Nobile  
WISE CARTER CHILD & CARAWAY, P.A.  
401 E. Capitol Street  
Heritage Building, Suite 600  
Jackson, Mississippi 39201

**Honorable Delbert Hosemann**

*Via E-file*

**Secretary of State**

c/o Harold Pizzetta, III  
Office of the Attorney General  
550 High Street  
Jackson, MS 39205

**Copiah County, Mississippi Election  
Commission**

*Via E-file*

c/o Elise Berry Munn  
Berry & Munn, PA  
P. O. Drawer 768  
Hazlehurst, MS 39083

**Hinds County, Mississippi Election  
Commission**

*Via E-file*

c/o Peter Teeuwissen  
Simon & Teeuwissen, PLLC  
P.O. Box 16787  
Jackson, MS 39236

**Jefferson Davis County, Mississippi  
Election Commission**

*Via E-file*

c/o Robert E. Sanders  
Young, Wells, Williams, P.A.  
141 Township Ave., Suite 300  
P.O. Box 3005 Richland, MS 39158-6005

**Lauderdale County, Mississippi Election  
Commission**

*Via E-file*

c/o Lee Thaggard  
Barry, Palmer, Thaggard, May & Bailey, LLP  
505 Constitution Ave.  
P.O. Box 2009  
Meridian, MS 39302-2009

**Leake County, Mississippi Election  
Commission**

*Via E-file*

c/o Jeffrey T. Webb  
Webb Law Firm, PLLC  
203 South Pearl Street  
Carthage, MS 39051

**Madison County, Mississippi  
Election Commission**

*Via E-file*

c/o Alphonso Michael Espy  
Mike Espy, Attorney at Law, PLLC  
317 E. Capitol St., Suite 101  
Jackson, MS 39201

*Via E-file*

**Rankin County, Mississippi Election  
Commission**

Rankin County Courthouse  
215 E. Government St.  
Brandon, MS 39042

**Simpson County, Mississippi Election  
Commission**

*Via U.S. Mail*

Simpson County Courthouse  
100 Court Ave., Suite 2  
Mendenhall, MS 39114

**Yazoo County, Mississippi Election  
Commission**

*Via U.S. Mail*

Yazoo County Courthouse  
211 E. Broadway  
Yazoo City, MS 39194